

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of:

The Wireline Competition Bureau Seeks)	CC Docket 96-45
Comment on Petitions Concerning)	WC Docket No. 03-109
Eligible Telecommunications Designations)	
and the Lifeline and Link-Up Universal)	
Service Support Mechanism)	

Comments of American Association of People with Disabilities (“AAPD”) and Self Help for the Hard of Hearing (“SHHH”)

The above-named organizations hereby submit the following Comments in Support of the Petitions of Tracfone Wireless, Inc., CC 96-45 and AT&T, WC 03-109 to increase the access of low-income people with disabilities to wireless telecommunications services.

In particular, we support the inclusion of wireless providers and resellers as eligible telecommunications carriers (“ETC”) in the Lifeline Universal Service Program for the reasons stated below. Adding these providers and resellers will enable a greater number of qualifying low-income consumers with disabilities to reap the significant benefits of wireless telephone services.

The American Association of People with Disabilities is a national membership organization for people with all types of disabilities, their family members and supporters. With more than 90,000 members around the country, AAPD works to promote political and economic empowerment for the more than 56 million children and

adults with disabilities in the U.S. AAPD has a strong interest in deployment of broadband and other technologies in a manner that is accessible and affordable for disabled people and their families.

Self Help for Hard of Hearing People, SHHH, is the nation's foremost consumer organization representing people with hearing loss. SHHH's national support network includes an office in the Washington D.C. area, 13 state organizations, and 250 local chapters. The SHHH mission is to open the world of communication to people with hearing loss through information, education, advocacy, and support. SHHH provides cutting edge information to consumers, professionals and family members through their website, www.hearingloss.org, their award -winning publication, *Hearing Loss*, and hearing accessible national and regional conventions. SHHH impacts accessibility, public policy, research, public awareness, and service delivery related to hearing loss on a national and global level.

In today's rapidly evolving telecommunications marketplace, wireless phone service is for many low income Americans with disabilities a better option than traditional wireline phone service. Wireless service offers an extra measure of mobility and flexibility – services that are so important to individuals who may otherwise be limited in their daily affairs. This is especially important for individuals who must travel long distances to work and who may not have telephones at their places of employment. These individuals rely on cell phones to keep in touch with their family, health care providers, schools and

emergency services. In addition, job seekers need a means for scheduling interviews and quickly returning calls from prospective employers.

The critical importance of access to wireless services for people with disabilities has been demonstrated to the Commission in a number of proceedings. The first of these was the Commission's E911 proceeding, which resulted in the creation of a consumer-industry forum (the TTY Forum) that worked tirelessly over a period of nearly three years to find technical solutions to make wireless services compatible with TTYs. The second of these proceedings continues to be the Commission's hearing aid compatibility proceeding, which is designed to ensure that wireless phones are accessible to individuals who use hearing aids or cochlear implants. Yet a third matter concerning wireless access by people with disabilities was brought to the Commission's attention approximately a year ago, through the first formal complaint brought under Section 255 of the Telecommunications Act. That complaint was filed by a blind individual who sought audio access to cell phones.

A significant percentage of Americans with disabilities are also low income. Even with passage of the Americans with Disabilities Act, it has been difficult for these individuals to secure employment. As a result, many people with disabilities are on SSI and participate in other federal programs that make them eligible for Lifeline participation. For these individuals, access to phone service is not a luxury; it is a critical necessity. That is why the disability community has vigorously advocated for accessible wireless services and equipment. Phone service cannot only mean the difference between life and

death in an emergency; it is an essential tool for independent living. Access to wireless services, such as those described in the pending Tracfone Petition, allows people with disabilities to more fully participate in society while having access to family medical providers and emergency services. For family members who care for relatives with disabilities, wireless service has also become essential.

Lifeline was created to ensure that all Americans have access to telecommunications services. To fully achieve that goal in the twenty-first century, low-income people with disabilities should have access to competitive wireless services of all kinds, including the prepaid wireless services described in the Tracfone petition. Prepaid services in particular hold promise for low income people because there are no long term contracts that may be difficult to honor, no additional charges for late payment and very often, as set out in the Tracfone petition, these services provide additional benefits like voice mail and long distance at no additional charge.

We believe that expanding the carrier choices for low-income people to all carriers that are willing to meet the service requirements – whether wireline or wireless, facilities based providers or resellers – is in the public interest. It would bring the same choices and consumer benefits to low-income people that are available to all other Americans, and most importantly, it would lower costs and increase the participation of eligible Americans in the Lifeline Program.

Respectfully Submitted,

Andrew J. Imparato
President and CEO
American Association of People with Disabilities (AAPD)
1629 K Street, NW, Suite 503
Washington, DC 20006

Brenda Battat
Senior Director of Public Policy and Development
Self Help for Hard of Hearing People - SHHH
7910 Woodmont Avenue, Suite 1200
Bethesda, MD 20814